



## CITY OF EUREKA

## PUBLIC WORKS DEPARTMENT

531 K Street • Eureka, California 95501-1146

March 5, 2015

Mr. Charles Reed  
California Regional Water Quality Control Board  
North Coast Region 1  
5550 Skylane Boulevard, Suite A  
Santa Rosa, CA 95403

### RE: REQUEST TO USE ALTERNATE ANALYTICAL METHOD

Dear Mr. Reed:

As part of the City of Eureka's Pretreatment program, the effluent from Mission Linen (a non categorical significant industrial user) is monitored for Total Petroleum Hydrocarbons (TPH) using EPA Method 1664. Method 1664 is used because it is a method approved by 40 CFR Part 136. While valuable at quantifying the amount of TPH in effluent method 1664 may be subject to interferences and does not provide a qualitative effluent analysis.

Mission Linen is currently in Significant Non-Compliance for chronic Total Petroleum Hydrocarbon limit violations. In an attempt to determine if there is a positive interference, and to qualify the effluent, an analysis was conducted using gas chromatography. The results of this analysis showed material in the molecular range of Bunker C, Motor, Oil, and Diesel. However the materials did not exhibit the peak patterns consistent with those compounds.

This discrepancy was discussed with Pretreatment Personnel from the City of Reno who have encountered similar problems. The resolution was to use EPA Approved Method 8015(b) with adequate amounts of silica gel to remove any interference. This resulted in elimination of the interference.

Method 8015(b) is an EPA approved validated analytical method for analyzing Total Petroleum Hydrocarbon. 40 CFR section 403.12(g)(5) (see below) allows the use of validated analytical methods that are not approved where 40 CFR part 136 does not include sampling or analytical techniques for the pollutant in question. Currently there is no Method for analyzing Total Petroleum Hydrocarbons as Bunker C, Oil, or Diesel that is approved by 40 CFR part 136.

#### UTILITIES OPERATIONS DIVISION

Wastewater Treatment	(707) 441-4364	Pretreatment	(707) 441-4362
Water Treatment	(707) 441-4234	Water Quality Laboratory	(707) 441-4363
FAX – Wastewater Treatment	(707) 441-4366	FAX - Water Treatment	(707) 441-4265



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The City of Eureka requests that it be allowed to use EPA Method 8015(b) as an alternate.

Please contact me if you have any questions.

Justin Boyes  
Source Control Supervisor

### 40 CFR Part 403.12(g)(5)

All analyses shall be performed in accordance with procedures established by the Administrator pursuant to section 304(h) of the Act and contained in 40 CFR part 136 and amendments thereto or with any other test procedures approved by the Administrator. (See, §§136.4 and 136.5.) Sampling shall be performed in accordance with the techniques approved by the Administrator. Where 40 CFR part 136 does not include sampling or analytical techniques for the pollutants in question, or where the Administrator determines that the part 136 sampling and analytical techniques are inappropriate for the pollutant in question, sampling and analyses shall be performed using validated analytical methods or any other sampling and analytical procedures, including procedures suggested by the POTW or other parties, approved by the Administrator.

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